

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO EASTERN DIVISION**

TIMOTHY GALES,	:	
Plaintiff,	:	CASE NO. 2:21-CV-328
v.	:	JUDGE MICHAEL H. WATSON
THOMAS P. CHARLES, <i>et al.</i>,	:	MAGISTRATE JUDGE
Defendant.	:	KIMBERLY A. JOLSON

DEFENDANT DAVID STANTON’S MOTION FOR EXTENSION TO MOVE OR PLEAD

Pursuant to Local Rule 6.1(a), Defendant David Stanton respectfully moves for an extension of 14 days from September 29, 2022 to move or plead in response to the plaintiff’s amended complaint, such that any responsive motion or pleading is due no later than October 13, 2022. This is the first requested extension in this case; no prior extensions of time have been sought or provided in this matter. The requested extension is not interposed for delay. Instead, the undersigned was retained this week and, due to a current illness and the nature of the claims presented, will need the requested additional time to respond to the amended complaint fully. The undersigned has not sought a stipulation from the plaintiff as to the extension as the Clerk of Court’s roster of parties does not reflect an e-mail address for the plaintiff and the press of time makes regular mail correspondence as to the stipulation impracticable.

Dated: September 29, 2022

Respectfully submitted,

By: /s/ Edward G. Hubbard
Edward G. Hubbard (0067784)
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Trial Attorney for David Stanton.

CERTIFICATE OF SERVICE

I hereby certify that on September 29, 2022, a copy of the foregoing *Motion to Dismiss* was served on the registered ECF participants, electronically through the court's ECF System at the e-mail address registered with the Court, on plaintiff by regular U.S. Mail upon:

Timothy Gales
710 Glendower Avenue
Columbus, OH 43207

/s/ Edward G. Hubbard
Edward G. Hubbard (0067784)